

29<sup>th</sup> October 2017

Dear Ms Walker,

Re: Application 17/01400/FUL – Inglewood Hall, Green Street, Sunbury, TW16 6QB

The applicant makes no mention of the Supplementary Planning Document 2011 on parking standards. Instead, in his Design and Access Statement (DAS) he quotes Policy CC3 of the Core Strategy and Policies Development Plan Document 2009 which has been superseded by the SPD (in which the term 'maximum' was replaced by the word 'minimum' after the then coalition government overturned an earlier directive from a previous administration).

It would seem also that the County Highways Authority itself has got this wrong, to wit: *"Only four on-site parking spaces are proposed for the development. This creates a shortfall of three spaces - according to Spelthorne Borough Council's Parking Standards. Given this shortfall, a demand for on-street parking for three vehicles can be predicted"*. In fact, had County researched this they would see that the SPD makes it clear that there should be no fewer than eleven spaces – four more than the three they have specified.

Furthermore, the Authority states: *"There are single yellow lines on both sides of Green Street, and double yellow lines at junctions with other roads- which act as a parking deterrent. Therefore we are not concerned that the demand for on-street parking mentioned above, would cause a safety issue in Green Street. Nursery Road, which is right next to the development is wide enough to accommodate on-street parking and the passage of vehicles. Therefore, any demand for on-street parking in this road arising from the proposed development, would be safely accommodated on the highway. These points address one of the concerns about increased demand for parking raised in the letters of representation."* It can only be assumed that the HA has drawn its conclusions from a table-top highways plan. Anyone with local knowledge of Nursery Road would know that on-street parking is a menace often limiting traffic to alternate directions, especially during school opening and closing times. Unsurprisingly, and with depressing predictability, the Highways Authority has raised no objection.

As to the case for eleven parking spaces, the applicant proposes the following development:

The bedroom units and sizes are as follows:

- Flat 1 – 3 bedroom (5 persons) – 112.4sqm (exceeds the minimum 86sqm)
- Flat 2 – 2 bedroom (3 persons) – 116sqm (exceeds the minimum 70sqm)
- Flat 3 – 2 bedroom (3 persons) – 92.6sqm (exceeds the minimum 70sqm)
- Flat 4 – 2 bedroom (3 persons) – 88.5sqm (exceeds the minimum 70sqm)
- Flat 5 – 3 bedroom (5 persons) – 109.5sqm (exceeds the minimum 86sqm)
- Flat 6 – 2 bedroom (3 persons) – 62sqm (exceeds the minimum 61sqm)

The SPD states that 3 bedroom dwellings above 80 sq. m gross floor area excluding garages should be provided with 2.25 parking spaces. As can be seen above, both 3 bed properties exceed the provision of 80 sq. m. (therefore a total of 4.5 spaces); 2 bedroom dwellings require 1.5 spaces (total 6 spaces).

Notes to SPD: state that *"The Council's residential parking standards will be applied to all forms of residential development including new dwellings, conversions and subdivision of plots and....If the total maximum parking requirement is a fraction **then that total figure must be rounded up to the nearest whole number.**"* Thus, we get the figure of eleven car parking spaces.

The only exception to the above requirements is outlined at para. 5 of the SPD which relates to the Borough's 4 town centres. Inglewood Hall does not fall within a town centre.

As mentioned above, and notwithstanding the misjudged comments of the Highways Authority, the applicant, in his DAS quotes from Policy CC3 but seems to have paid little regard to the provisions contained within subsections (c) & (d) – *“the impact on highway safety from potential on-street parking and the scope for measures to overcome any problems; and the need to make adequate and convenient provision for disabled parking.”*

In closing, this Association is aware that there is already an extant approval for this site and can only assume that application 17/01400/FUL represents an attempt to extract a greater return for the applicant. Whilst there is nothing wrong with that, it should not be in defiance of local planning law and the wishes of the neighbouring community who would be greatly inconvenienced should this application be approved. We urge you to recommend refusal.

Yours sincerely,

John Hirsh,  
Hon. Vice-chairman, Lower Sunbury Residents' Association (LOSRA),  
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Sunbury, TW16 6RB